

Overarching Implementation Assessment	
RT Agreement	Action Item(s)
<ul style="list-style-type: none"> Implementation is taking long time. This identifies a problem; recommendation to be formulated. RT examined not just what WHOIS1 recommended but performed a cumulative review 	n/a
WHOIS1 - Rec 1 - Strategic Priority	
RT Agreement	Action Item(s)
<ul style="list-style-type: none"> Where is the strategy for WHOIS that was made a priority? Who owns WHOIS strategy? Who tracks and provides oversight for that strategy? What does success look like? High-level guidance to measure success against metrics is needed ICANN took actions but not those envisioned by the WHOIS1 recommendation - notably the Board WG or EWG are not the cross-community committee that WHOIS1 recommended 	n/a
WHOIS1 - Rec 2 - Single WHOIS Policy	
RT Agreement	Action Item(s)
<ul style="list-style-type: none"> There is no single WHOIS policy The Board did not have power to produce a single WHOIS policy but took actions it is empowered to take (initiated a PDP, developed a process framework, etc.) In absence of single WHOIS policy, action were taken to provide consolidation and navigation - although improvements could be made to that, it still would not be a single policy RT agreement with subgroup recommendation: <ul style="list-style-type: none"> Accept that WHOIS1 RT Recommendation is fully implemented. Accept that the adoption of the EWG's Final Report and development of the framework for the Board-initiated GNSO RDS 	n/a

<p>PDP[s] is intended to deliver a holistic next generation WHOIS policy framework that would address current set of fragmented and decentralized WHOIS policies.</p> <ul style="list-style-type: none"> • Objection from Stephanie Perrin. 	
WHOIS1 - Rec 3 - Outreach	
RT Agreement	Action Item(s)
<ul style="list-style-type: none"> • Materials are available but not up-to-date, nor labeled appropriately • Insufficient targeted outreach outside the ICANN community. Need to identify where outreach is needed. • Agreement on recommendations: <ul style="list-style-type: none"> ○ Public-facing info related to gTLD registration needs to be reviewed and formulated to ensure up to date and consistent messaging. Information to be updated includes RAA related documents on registrant rights, benefits and responsibilities, the WHOIS portal, and education tools (e.g., ICANN Learn, video tutorials). ○ Recommendation to perform outreach activities should be reiterated. Goals for outreach should be more explicitly enumerated. 	n/a
WHOIS1 - Rec 4 - Compliance	
RT Agreement	Action Item(s)
<ul style="list-style-type: none"> • Subgroup analyzed findings for rec 4 implementation but has not yet formulated recommendations. • Subgroup has not yet documented findings/analysis for its second objective, although it put forward two recommendations associated with that objective. • The compliance and accuracy subgroups need to consider how to reconcile overlaps between their findings and recommendations. 	<ul style="list-style-type: none"> • Susan to confirm questions for ICANN compliance. • Subgroup to try testing recommendation on WHOIS policies that are being examined by this review (e.g., PP, IDN) to see if metrics/monitoring/reporting and enforcement have been defined for those • Susan to formulate recommendation to address the following: <ul style="list-style-type: none"> ○ Should monitoring be proactive as well as reactive? Not just complaint-driven or addressing individual complaints, but also addressing systemic complaints

<ul style="list-style-type: none"> Findings/issues/recommendations will be handled by the two subgroups through Susan to avoid duplication of effort. Rec (4)1: All policies implemented should require metrics, measurement, auditing, tracking, reporting and enforcement by the compliance team. Rec (4)2: All DN registrations should be required to adhere to the WHOIS requirements in the 2013 RAA 	<p>(e.g., many complaints about the same domain or registrar)</p> <ul style="list-style-type: none"> Should there be a recommendation to build on DAAR as input to compliance? (see CCT recommendation) - opportunity to look for patterns that identify bad actors (for example, registrars with high # of inaccuracies) Susan to examine CCT recommendation on DAAR to build this subgroup's recommendation Susan to research 2013 RAA negotiation materials to determine any reasons for allowing grandfathering.
<p>WHOIS1 - Recs 5-9 - Data Accuracy</p>	
<p>RT Agreement</p>	<p>Action Item(s)</p>
<ul style="list-style-type: none"> A lot of work has been done on recs 5-9 but reporting is not necessarily clear. Implementation failed to meet objectives of these WHOIS1 recommendations. However, there is a question as to what extent the objectives can be achieved. Susan and Lili to confirm questions for ICANN compliance. Findings/issues/recommendations will be handled by the two subgroups to avoid duplication of effort. 	<ul style="list-style-type: none"> Lili to look into Compliance actions and link their work to data accuracy subgroup Lili to confirm list of questions to ICANN Compliance
<p>WHOIS1 - Rec 10 - Privacy/Proxy Services</p>	
<p>RT Agreement</p>	<p>Action Item(s)</p>
<ul style="list-style-type: none"> Several Issues identified based on findings - of those, Volker has an action to clarify Two new issues identified: the length of time this recommendation took to implement, and risk fo PP service abuse by criminals No recommendations at this time specific to Rec 10, but the RT should track the progress of the IRT and consider recommendation(s) related to compliance if necessary. In addition to specific recommendations, there will likely be a general recommendation about the 	<ul style="list-style-type: none"> Volker to clarify issues.

duration of policy development/implementation.	
WHOIS 1 - Rec 11 - Common Interface	
RT Agreement	Action Item(s)
<ul style="list-style-type: none"> • InterNIC was not overhauled, but common interface was provided • However, common interface has no metrics that can be used to determine its effectiveness • Metrics and SLAs could be used to address this and also to proactively spot non-compliance • In any recommendation made, be more explicit about intent of common interface (one stop access to data, across all gTLDs and registrars/resellers) 	n/a
WHOIS 1 - Rec 12-14 - IDNs	
RT Agreement	Action Item(s)
<ul style="list-style-type: none"> • Work was done to the extent it can be done without an RDAP-based WHOIS system. • Note the commercial feasibility loophole in the current contracts allows registrars and registries to not implement RDAP. 	n/a
WHOIS 1 - Recs 15-16 - Plan/Annual Report	
RT Agreement	Action Item(s)
<ul style="list-style-type: none"> • Recommendation to improve methodology when documenting implementation steps/milestones: More effective reporting structure is needed • Outcome based reporting, not just activity-based report • Develop/track progress against a work plan, not just an action plan. • Make similar recommendation for reporting on implementation of this RT's recommendations and the annual WHOIS reports, but including desired characteristics for those reports to make them more effective. For example, are quarterly status reports in implementation 	n/a

<p>a substitute for an annual report on the implementation</p>	
<p>Subgroup 2 - Anything New</p>	
<p>RT Agreement</p>	<p>Action Item(s)</p>
<ul style="list-style-type: none"> • Several items have compliance implications - to be addressed by the compliance subgroup • Several items already covered by WHOIS1 rec subgroups • Agree to deal with Reseller lack of transparency under Consumer Trust subgroup • Agree to make general comment re: dissatisfaction with handling of conflicts with privacy law (under auspices of overall report) • Noting overall that the impact of GDPR has not yet been addressed in this review (under auspices of overall report's preamble) 	
<p>Subgroup 3 - Law Enforcement Needs</p>	
<p>RT Agreement</p>	<p>Action Item(s)</p>
<ul style="list-style-type: none"> • It would be useful to survey LE now, to establish a baseline for comparison • The same survey would need to be re-run post-GDPR to assess impact • It is important the survey have global reach • The full RT can assist on survey methodology • Lili agreed to join subgroup to assist - especially in conducting outreach to her Interpol contacts. • Goal of survey: to examine the questions raised in the objective (speed, availability, accuracy of data...). 	<ul style="list-style-type: none"> • Lili to review the questions Cathrin provided to the subgroup • Subgroup to draft survey questions for review team consideration
<p>Subgroup 4 - Consumer Trust</p>	
<p>RT Agreement</p>	<p>Action Item(s)</p>
<ul style="list-style-type: none"> • Definition of consumer to be addressed must be broad and include Internet users 	<ul style="list-style-type: none"> • Erika to take feedback on-board and use outputs of other subgroups to assess impact of WHOIS1 rec implementation on

<ul style="list-style-type: none"> • WHOIS contributes to consumer trust, mostly indirectly • Subgroup will take feedback on-board and use outputs of other subgroups to assess impact of WHOIS1 rec implementation on consumer trust • Strong direction but still need to do work, being aware of potential for drift into non-WHOIS aspects of CT. • Subgroup should formulate a recommendation noting lack of Reseller transparency in WHOIS as a potential gap, to be addressed through policy and/or contractual changes 	<p>consumer trust</p> <ul style="list-style-type: none"> • Subgroup to take on “reseller lack of transparency” topic
<p>Subgroup 5 - Safeguarding Registrant Data</p>	
<p>RT Agreement</p>	<p>Action Item(s)</p>
<ul style="list-style-type: none"> • Formulate new recommendation that ICANN should use contemporary standards for secure data storage and retention and breach notification. • Subgroup defers request to interview escrow providers and contracted parties. • Subgroup wishes to review of contracts in place with escrow providers regarding data storage and breach notification • Subgroup to develop further. findings/issues after examining contracts • Breach notification involves notification of ICANN by escrow providers; the RT does not wish to extend this to notification of individual registrants 	<ul style="list-style-type: none"> • Questions for ICANN org : <ul style="list-style-type: none"> ○ What are contractual requirements to secure stored escrow data ○ What are contractual requirements to notify ICANN in the event of breach ○ How do you secure registrant data under your control? • Alan to refine question number 3
<p>Draft Report</p>	
<p>RT Agreement</p>	<p>Action Item(s)</p>
<ul style="list-style-type: none"> • Lead off with statement about GDPR and how to the RT handled the changing landscape • Include somewhere a statement (observation/recommendation) about how ICANN handled GDPR and other applicable laws • Within each subgroup report, include standard section that would address any impact the GDPR has on its findings (e.g. 	

<p>where recommendations apply without impact by data protection laws, areas that might need to be reassessed after policies change as a result of applicable laws)</p>	
Next Steps	
RT Agreement	Action Item(s)
<ul style="list-style-type: none"> • Subgroups to use WHOIS implementation assessment framework as a checklist • No adjustments needed to work plan • Proceed with the current draft report structure (with caveat that changes may be needed) 	<ul style="list-style-type: none"> • ICANN org to ensure/monitor the ICANN62 session does not conflict with the Auctions Proceed session. (Session was submitted as a high interest session by Alan) • Leadership to contact Volker and Thomas to determine if the matters that prevented them from participating actively are expected to continue. • Rapporteurs to reach out to Stephanie if need help (Stephanie's areas of expertise: risk management, privacy, and law enforcement) • Stephanie and Lili to be added to Subgroup 3 - Law Enforcement • Dmitry to be added to Rec #10: Privacy/Proxy Services • ICANN org to contact meetings team to enquire about availability for a 2 day face-to-face meeting in July (preferably in Brussels). • ICANN org to insert Introduction section to contain over-arching findings and recommendations, including impact of GDPR and over-arching recommendations • ICANN org to begin populating sections that pertain to background, methodology etc.
Other	
RT Agreement	Action Item(s)
	<ul style="list-style-type: none"> • ICANN Org to produce meeting statement.